

IN THE UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

IN RE CONAGRA FOODS, INC.

Case No. CV 11-05379-CJC (AGRx)

MDL No. 2291

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' APPLICATION TO
FILE UNDER SEAL**

Hon. Cormac J. Carney

The Court has considered all materials in support of Plaintiffs' Application for Leave to File Under Seal. As set forth in Plaintiffs' Application, Plaintiffs have requested to file portions of the following documents under seal:

1. Reply In Support Of Renewed Motion And Memorandum In Support For Final Approval Of The Settlement And Award Of Attorneys' Fees, Expenses, And Service Awards (the "Reply Brief").
2. Joint Reply Declaration of Class Counsel in Support of Plaintiffs' Renewed Motion for Final Approval of the Settlement and Award of Attorneys' Fees, Expenses, & Representative Plaintiffs' Service Awards, and exhibits thereto (the "Reply Declaration of Class Counsel").

This Application concerns the same settlement communications and subject matter as Objector M. Todd Henderson's pending Application For Leave To File Under Seal, filed on December 3, 2021 (Dkt. 757). In response, and pursuant to L.R. 79-5.2.2(b)(i) and the June 25, 2013, Stipulated Protective Order (ECF No. 163), Plaintiffs filed the Declaration of Class Counsel Supplementing and Joining the Declaration of Defendant's Counsel Andrew G Phillips in Support of Objector M. Todd Henderson's Application for Leave to File Under Seal (ECF No. 762) and Response to Class Member Shiyang Huang's Opposition to Objector M. Todd Henderson's Application Seal (ECF No. 761) on December 7, 2021 (ECF No. 763).

Plaintiffs filed a separate and additional Application for Leave to File Under Seal on December 10, 2021, seeking to file portions of its Reply Brief and Declaration of Class Counsel, and exhibits thereto, under seal.

Plaintiffs' Application is made on the basis that portions of the Reply Brief and Declaration of Class Counsel, and all exhibits thereto, contain and refer to materials that consist of or discuss highly sensitive or confidential settlement communications and negotiations between the parties and/or with the Court-appointed mediator, the Honorable Douglas McCormick, and/or the settlement claims administrator selected by Magistrate Judge McCormick, and thus satisfy the standard of "(1) establishing good cause or demonstrating compelling reasons why the strong presumption of public access in civil cases should be overcome."

Accordingly, IT IS HEREBY ORDERED AS FOLLOWS:

1. Plaintiffs' Application for Leave to File Under Seal is GRANTED.
2. Plaintiffs may file their Reply Brief under seal, and publicly file the proposed redacted version.

3. Plaintiffs may file the Reply Declaration of Class Counsel, and all exhibits thereto, under seal, and publicly file the proposed redacted version.
4. Such unredacted versions of the Reply Brief and Reply Declaration of Class Counsel are hereby ordered sealed.

IT IS SO ORDERED

Dated: _____

HON. CORMAC J. CARNEY
UNITED STATES DISTRICT JUDGE